UNITED STATES DISTRICT COURT		
SOUTHERN DISTRICT OF NEW YORK		<u></u>
IN RE WORLD TRADE CENTER		21MC102(AKH)
LOWER MANHATTAN DISASTER		
SITE LITIGATION		
		<del></del>
KRZYSZTOF SZCZEPANSKI (AND WIFE, ANNA		06CV15084(AKH)
SZCZEPANSKI),	•	
		NOTICE OF ADOPTION BY
	Plaintiff(s),	ZAR REALTY
		MANAGEMENT CORP. OF
-against-		ANSWER TO MASTER
		COMPLAINT
100 CHURCH LLC, et al.,		

PLEASE TAKE NOTICE that defendant ZAR REALTY MANAGEMENT CORP.

n/k/a SAPIR REALTY MANAGEMENT CORP. for the building located at 100 Church Street, (hereinafter "Zar/Sapir") as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Zar/Sapir 's Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). ZAR/SAPIR has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

Defendants.

**PLEASE TAKE FURTHER NOTICE THAT** defendant, Zar/Sapir reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 ( $\P$  D(1)-(5)).

**WHEREFORE**, Zar/Sapir demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York December 4, 2007

## HARRIS BEACH PLLC

Attorneys for Defendant ZAR REALTY MANAGEMENT CORP. n/k/a SAPIR REALTY MANAGEMENT CORP.

/s/

Stanley Goos, Esq. (SG 7062) 100 Wall Street, 23<sup>rd</sup> Floor New York, New York 10005 (212) 687-0100

TO:

Paul Napoli, Esq. Worby Groner Edelman & Napoli Bern LLP 115 Broadway, 12<sup>th</sup> Floor New York, New York 10006

Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279 *Liaison Counsel for Plaintiff* 

James E. Tyrrell, Esq. Joseph Hopkins, Esq. Patton Boggs LLP One Riverfront Plaza, 6<sup>th</sup> Floor Newark, New Jersey 07102

Thomas Egan, Esq.
Flemming Zulack Williamson Zauderer LLP
One Liberty Plaza
New York, New York 10006
Liaison Counsel for the Defendants

All Counsel via ECF

## **CERTIFICATION AS TO SERVICE**

The undersigned certifies that on December 4, 2007, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Zar Realty Management Corp.'s Adoption of Answer to Master Complaint.

Dated: December 4, 2007

/s/ Stanley Goos, Esq. (SG 7062)